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July 17, 2024

VIA ECF
Magistrate Judge Marcia M. Henry, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 504N
Brooklyn, New York 11201

Re: Wilson v Consumer Legal Group PC *et ano*
Case No.: 24-cv-2276 (MMH)

Honorable Magistrate Judge Henry:

This firm represents Defendant Consumer Legal Group PC (“CLG”). It is our understanding that Defendant Phoenix Debt Pros, Inc. has defaulted.

We write in furtherance of Your Honor’s directive pursuant to the conference held with Your Honor on July 10, 2024. Pursuant thereto, CLG intends to file a dispositive motion pursuant to F.R.C.P. Rule 12(b)(6) and 12(b)(7).

We understand from [Administrative Order 2023-23](#) that the Clerk will randomly assign a District Judge to serve as the presiding judge in the case and within seven (7) days after such assignment, CLG will file either a pre-motion letter or a motion as provided for in the District Judge’s Individual Practices, or pursuant to any order issued by the District Judge.

CLG is also advises the Court that the attorney that filed and signed the Complaint, Anthony Paronich, is not admitted to practice law in New York and although he filed his motion to be admitted to practice pro hac vice *after* he filed the Complaint in this Court, the docket does not reflect the Notice of Appearance that the Court ordered him to file on June 4, 2024. Similarly, the attorney that appeared on Plaintiff’s behalf at the July 10, 2024 conference, Andrew Perrong, is *also* not admitted to practice law in New York though this Court *did* grant his motion to be admitted pro hac vice on July 10, 2024. Notably, both Mr. Paronich and Mr. Perrong are serial filers of dozens of TCPA lawsuits across the country, many of which bearing Mr. Perrong as a named Plaintiff and as counsel as referenced by the United States District Court for the Eastern District of Pennsylvania: Mr. Perrong “is a frequent filer of Telephone Consumer Protection Act lawsuits.” *See, e.g., Perrong v. South Bay Energy Corp.* No. 2:20-cv-05781-JDW, 2021 WL 1387506 (E.D. Pa. April 13, 2021).

We thank the Court for its anticipated attention and courtesies in this matter. If the Court has any questions or concerns, we’re readily available to answer them.

Respectfully Submitted,

Jason J. Rebhun

JJR/